



February 9, 2022

Clatsop County Board of Commissioners
Astoria, Oregon
Via email: comdev@co.clatsop.or.us

Dear Board of Commissioners,

Oregon Coast Alliance is an Oregon nonprofit corporation whose mission is protection of coastal natural resources and working with coastal residents to improve community livability.

There are a variety of questions concerning the proposed short term rental provisions in Chapter 5.12, but most of these are technical. Our principal concern is with the new Chapter 5.24. This chapter is inaccurately summarized in the Agenda Item Summary, where it is described as merely transferring the Arch Cape STR standards to the Clatsop County Code and making a few minor adjustments. **Nowhere does the summary mention that the new 5.12 explicitly allows STRs for the first time in the Coastal Residential (CR) zone.** But the chapter itself makes that clear, “the purpose of this section is to regulate short-term rentals to enhance livability and safety in the Arch Cape and Coastal Residential zone neighborhoods.”

STRs are incompatible with, and *prohibited* in, rural land zones, as the October 25, 2021 letter from attorney Dan Kearns makes abundantly clear. As urban-oriented commercial enterprises, they are excluded by not being listed as an allowed use in any of the rural land zones, except Arch Cape (which is an urban, though unincorporated, community), where they are explicitly allowed and regulated.

Without admitting that the County has been illegally permitting STRs in the CR zone for years, the County is now trying to “solve” the problem it caused by creating a new ordinance, Chapter 5.12, to openly allow them! The result of such a move will likely be a major political train wreck.

The Board of Commissioners has heard impassioned testimonies from many parties about the extent to which STRs ruin neighborhoods and communities, in Falcon Cove Beach and

elsewhere. The added problem is that nearly all STRs are owned and operated by non-residents, and increasingly are simply purchased by non-residents as investment properties. In other words, there is no community relationship with STR owners; they are simply a commercial use in a residential zone. The evidence from other communities and counties on the coast is overwhelming that regulation is needed to curb the proliferation of these rentals, and residents are vitally concerned about the issue.

But what is Clatsop County proposing? Merely to legalize them where they have been illegal, make a few technical changes to the regulatory framework, and end this controversy. The County has clearly decided not to limit, restrict, cap or in any way stem STRs, or even enact a framework to incentivize them in commercial zones.

The County's proposed action will do the *opposite* of ending the controversy. Legalizing STRs where they have been illegal, and making mere technical changes without enacting a cap or any reduction mechanism, will draw a line in the sand for communities being engulfed in these rentals. As in Lincoln County, such a course will make lawsuits and ballot measures inevitable.

ORCA urges the County to begin the process of reducing STRs in rural land zones – rather than create an arena for political clashes that will undoubtedly last for years by legalizing them openly. There are several mechanisms available for a regulatory framework. In October 2021 Dan Kearns offered to meet with County officials to begin work on this task. There was no reply.

Please reconsider the proposal before you, and listen to the voices of your constituents and the communities you govern.

Please enter this testimony into the record of this matter.

Sincerely,

/s/ Cameron La Follette

Cameron La Follette
Executive Director